



Michael Cooke
MUNICIPAL SERVICES DIRECTOR
mcooke@turlock.ca.us

MUNICIPAL SERVICES DEPT
ADMINISTRATION

156 S. BROADWAY, SUITE 270 | TURLOCK, CALIFORNIA 95380 | PHONE 209-668-5599 EXT 4418 | FAX 209-668-5695

February 25, 2015

Mr. Jim Marshall, P.E.
Senior Engineer
California Water Quality Control Board
Central Valley Division
11020 Sun Center Drive, #200
Rancho Cordova, CA 95870-6114

**SUBJECT: CITY OF TURLOCK COMMENTS TO TENTATIVE WASTE DISCHARGE
REQUIREMENTS (NPDES PERMIT NO. CA0078948) DATED JANUARY 21, 2015.**

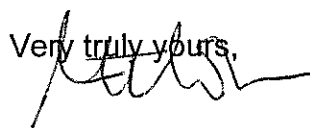
Dear Mr. Marshall,

The City of Turlock (City) appreciates the opportunity to provide these comments on the Tentative Waste Discharge Requirements (NPDES Permit No. CA0078948) for the City of Turlock Regional Water Quality Control Facility (Tentative Draft) dated January 21, 2015.

Thank you for considering and incorporating many of the City's earlier comments regarding appropriate permit terms, including those submitted to your office on November 17, 2014. Our review of the Tentative Draft resulted in the City having several further comments or additional questions requiring clarification or correction from your office prior to permit issuance. The City appreciates your further consideration of these comments and questions.

Attachment 1 includes the City's detailed comments on the Tentative Draft. Attachment 2 includes an evaluation of appropriate performance-based effluent limitations for electrical conductivity (EC) that the City believes should form the basis of slightly modified EC requirements. Although we note the Tentative Draft has an annual average EC limit of 1,100 µmhos/cm, recent trends in water conservation and the ongoing drought have resulted in a condition of decreasing wastewater influent flow and concurrent increases in influent EC concentrations. Consequently, the City is requesting that a performance-based annual average of EC limit of 1,250 µmhos/cm be incorporated into the final draft permit proposed for adoption. This is further explained in the attached analysis.

Should you have any questions please feel free to contact me.

Very truly yours,


Michael Cooke
Municipal Services Director

Cc: Nicole Granquist, Downey Brand

Attachment 1. Detailed Tentative Draft Comments

Waste Discharge Requirements

Page 5.

IV.A.1.f.: See attached request for modification of the performance-based effluent limitation for electrical conductivity (EC) from 1,100 µmhos/cm to 1,250 µmhos/cm due to changes in wastewater influent flows and characteristics.

Page 6.

IV.C.6.: Since this section pertains to reclamation, the term "effluent" should be removed and be replaced with "recycled water" (*i.e.*, "The Discharger shall maintain compliance with the following effluent recycled water limitations at" ... "Effluent Recycled water total coliforms" "Effluent Recycled water turbidity"...). Further, reference to "Discharge Points 002 and 003" should be removed and rephrased to "Discharge Points REC-001 and REC-002,

Page 7.

V.A.1.: Bacteria in receiving water. This requirement is purportedly removed from the Tentative Draft, as explained in the Fact Sheet on page F-91, D.1.f. The City requests that this requirement be removed from V.A.1 based upon the language within the Fact Sheet.

V.A.5.a. & b.: Dissolved Oxygen (D.O.) monthly median of the mean to fall below 85 percent saturation and 95th percentile to fall below 75 percent of saturation. In determining compliance with these values, the City seeks clarification as to whether the City is to utilize the weekly receiving water D.O. results from sample points RSW-001 and RSW-002 and assume D.O. saturation to be determined by temperature /oxygen tables found in Standard Methods for Examination of Water and Wastewater or similar EPA publication? If so, please specify in the final draft of the permit; if not, please specify another acceptable manner of measuring compliance.

Monitoring and Reporting Program

Page E-5.

IV.A.1., Table E-3: Effluent monitoring for temperature has both F° and C° listed. Is the City required to measure in both units or can temperature be reported as *either* F° or C°? Measuring and reporting in both units will be time consuming and redundant. The City requests that only reporting °C be required.

Page E-10.

VIII: Delta Regional Monitoring Program. The City's interpretation of this program indicates that the City's participation in the RMP is strictly voluntary and there is no requirement for if and when the City decides to participate in this program at this time. Is this correct? Additionally, the section refers specifically to the Delta Regional Monitoring Program and it may be helpful to include reference to a San Joaquin River Regional Monitoring Program as a partner organization or future option for the City.

Page E-11.

VIII.A.1.,Table E-8: Receiving water monitoring for temperature has both °F and °C listed. Is the City required to measure in both units or can temperature be reported as *either* °F or °C? Measuring and reporting in both units will be time consuming and redundant. The City requests that only reporting °C be required.

Page E-16.

IX.C.3.,Table E-11: Mercury. The sample type is listed as a 24-hr composite; however, all other requirements for mercury analysis are based on a grab sample, see footnote 2 referencing Table E-3. Collection of a 24-hour composite sample for mercury analysis may result in inaccurate results due to contamination from other sources. The City requests that the 24-hr composite requirement be removed and replaced with a grab sample, or the option of collecting mercury as a grab sample be included in the final permit.

Page E-17.

IX.C.3.Table E-11: Ammonia (as N). The sample type is listed as a 24-hr Composite; however, all other requirements are based on a grab sample. This is inconsistent with footnote 2 referencing Table E-3. The City requests that the 24-hr composite requirement be removed and replaced with a grab sample.

IX.C.3.Table E-11: Hardness (as CaCO₃). The sample type is listed as a grab sample; however, all other requirements are based on a 24-hr composite sample. This is inconsistent with footnote 2 referencing Table E-3. The City requests that the grab sample be removed and replaced with a 24-hr composite sample.

IX.C.3.Table E-11: Temperature; °F and °C listed. Is the City required to measure in both units or can temperature be reported as *either* °F or °C? Measuring and reporting in both units will be time consuming and redundant. The City requests that only reporting °C be required.

Page E-18.

IX.C.3.Table E-11: Total Dissolved Solids (TDS). The sample type is listed as a 24-hr Composite; however, all other requirements are based on a grab sample. ; This is inconsistent with footnote 2 referencing Table E-3. The City requests that the 24-hr composite requirement be removed and replaced with a grab sample.

Fact Sheet

Page F-4.

I. PERMIT INFORMATION: The City requests language be added under a new section as I.D. "The Discharger was issued a Time Schedule Order (TSO) R5-2014-0901 by the Central Valley Water Board on July 22, 2014 providing the interim effluent limitations for copper, selenium, carbon tetrachloride, nitrate, silver, and aluminum through 31 December 2014. The interim effluent limitations for dichlorobromomethane and chlorodibromomethane are effective through 31 December 2019."

II.A.: last paragraph. Please edit the last sentence to read (new text in underline/strike-out format):

"The Discharger also provides an average of 100,000 gallons per day for irrigation purposes at the Pedretti Sports Complex."

Page F-9.

Please correct the typographical error of two "periods" in the second to last line of the last paragraph.

Page F-15.

B.2.a.: BOD & TSS. The text references section IV.C.3.c.xi of this Attachment for the discussion on pathogens. This section does not exist, could the proper section be IV.C.3.c.x?

Page F-37.

3.a.ii.: Chloride. The fact sheet does not contain the referenced section IV.C.3.c.xiii.

Page F-63.

3.a.xii.b.2.: Please update the EC data to reflect the most current data in Attachment 2 (proposed EC effluent limitation modification).

Page F-66.

Table F-21: Boron continues to be listed when it was removed from the Tentative Draft on Page F-88 (B.3. effluent rationale.)

Page F-91.

VII.D.1.f: "this order discontinues receiving water monitoring requirements for fecal coliform organisms." Given this statement, should fecal coliform be removed on page 7 V.A.1. as a receiving water limit?

Attachment 2. Water Conservation and Drought Effects on City of Turlock Performance-Based Electrical Conductivity Effluent Limitations (Attached)